

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

RI SEEKONK HOLDINGS , LLC)	
Plaintiff,)	
)	
V.)	CIVIL ACTION NO. 04-11682NMG
)	
TIMOTHY P. MCINERNEY,)	
individually and as in his)	
capacity as town administrator)	
of the TOWN OF SEEKONK)	
and TOWN OF SEEKONK ,)	
Defendants.)	

JOINT MOTION TO EXTEND CERTAIN
SCHEDULING ORDER DEADLINES

The parties in the above-captioned matter, hereby request this Honorable Court to extend the following deadlines of its current Scheduling Order:

- (1) All depositions (except experts) be completed sixty (60) days after decision on Plaintiff's Motion to Compel Deposition Testimony of Witness, Michael Lehane, Esq.
- (2) All trial experts of the parties be disclosed by October 13, 2006 and all expert depositions completed within thirty (30) days thereafter.
- (3) All dispositive motions, including motions for summary judgment, are to be filed by November 15, 2006 and responses by December 15, 2006.

The parties are awaiting the Court's determination of Plaintiff's Motion seeking to compel the deposition testimony of Defendant's former town counsel and whether the release of certain executive session minutes and other testimony has effectuated a waiver of the Town's attorney-client privilege as it relates to such former town counsel.

No party will be prejudiced by these proposed changes. Additionally, unavoidable scheduling issues relating to both witnesses and counsel have made this motion necessary. Therefore, the plaintiff and the defendants respectfully request that this Court allow the proposed changes and adjust any remaining events accordingly or as necessary.

Respectfully Submitted,

Plaintiff,
By its attorney,

Defendants,
By their attorney,

/s/ John B. Reilly
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